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12 Attorneys for Plaintiff
13 VERIGY US, INC.

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN JOSE DIVISION

17 VERIGY US, INC, a Delaware Corporation

18 Plaintiff,

19 vs.

20 ROMI OMAR MAYDER, an individual;
21 WESLEY MAYDER, an individual; SILICON
22 TEST SYSTEMS, INC., a California Corporation;
23 and SILICON TEST SOLUTIONS, LLC, a
24 California Limited Liability Corporation,
25 inclusive,

26 Defendants.

Case No. C07 04330 RMW (HRL)

**PLAINTIFF'S ADMINISTRATIVE
MOTION FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL**

Judge: Honorable Ronald M. Whyte
Ctm: 6

1 Pursuant to Civil Local Rules 7-11(a) and 79-5(b), Plaintiff Verigy U.S., Inc. ("Plaintiff"
2 or "Verigy") requests that the following materials be filed under seal, as they contain confidential
3 information that is protected by the Stipulated Protective Order entered by the Court on August
4 29, 2007. The documents submitted under seal include:

5 1. Portions of Plaintiff's Reply Memorandum of Points and Authorities in Support of
6 the Application for an Order to Show Cause Re: Contempt Against Defendants Romi
7 Mayder and Silicon Test Systems, Inc.

8 2. Exhibits 3, 4, 9, and 10 of the Reply Declaration of Michael W. Stebbins in Support
9 of the Application.

10 These materials (hereafter "the Materials") disclose information that has been designated
11 as "Highly Confidential—Attorneys' Eyes Only" or "Confidential" by the parties under the
12 Protective Order, without objection to those designations (although Verigy reserves its rights to
13 challenge such designations pursuant to the Stipulated Protective Order). Although the
14 information in the Materials has been designated as protected from disclosure under the Protective
15 Order, Verigy must rely on this information in support of its Application. The parties'
16 confidentiality interest therefore overcomes the right of public access to the record, as a substantial
17 probability exists that the parties' overriding confidentiality interest will be prejudiced if the
18 record is not sealed. Further, the proposed sealing is narrowly tailored and no less restrictive
19 means exist to achieve this overriding interest

20 Pursuant to Local Civil Rule 79-5(b)-(c), Verigy therefore lodges the Materials with this
21 Court, and respectfully requests leave to file the aforementioned documents under seal.

22 Respectfully submitted.

23 Dated: March 28, 2008

BERGESON, LLP

24 By: /s/
25 Melinda M. Morton
26 Attorneys for Plaintiff
27 VERIGY US, INC.
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